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D. David Slaton  
Chief of  
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December 31, 2003

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FCC - MAILROOM

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 W. 12<sup>th</sup> Street, S.W., Room TW-A306  
Washington, D.C. 20554

via E-filing

Ms Irene Flannery  
Vice President, High Cost and Low Income Division  
Universal Service Administrative Company  
2120 L Street, N.W., Suite 600  
Washington, D.C. 20037

via Fax 202-776-0080

Re: Certification of Support for Rural and Non-Rural High Cost Carriers Pursuant to 47 C.F.R.  
§§54.313-314, CC Docket Nos. 96-45 and 00-256

Dear Ms. Dortch & Ms. Flannery:

NPCR, Inc. d/b/a Nextel Partners and ALLTEL Communications, Inc. have recently received ETC designations from the Arkansas Public Service Commission pursuant to 47 U.S.C. § 214 (e)(6). Attached are copies of the orders granting ETC status. Following each Order is a list of the wirecenters to be served as an ETC by the respective carrier.

Based on representations made to the Arkansas Public Service Commission by these companies, the APSC hereby certifies that all federal high cost support provided to these companies will be used consistent with section 254 (e) of the Communications Act of 1934, as amended. NPCR, Inc. d/b/a Nextel Partners and ALLTEL Communications, Inc. have certified to the APSC that they will use federal high cost support only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with the requirements of 47 C.F.R. §54.313 and/or 47 C.F.R. § 54.314§254(e).

Eligibility letter for  
Nextel & ALLTEL  
page - 1 -

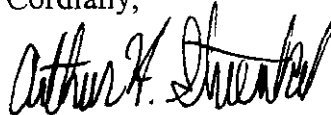
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If any additional information is needed to assure certification of these carriers, please contact me.

Please return a copy of this letter, noting your receipt, in the enclosed stamped, self addressed envelope

Cordially,

A handwritten signature in black ink, appearing to read "Arthur H. Stuenkel". The signature is fluid and cursive, with the first name "Arthur" being the most prominent.

Arthur H. Stuenkel  
Attorney for the Arkansas  
Public Service Commission

cc: Mr. Steve Mowery (ALLTEL Arkansas, Inc.)  
Mr. Steven Cuffman (Counsel for Nextel)

ARKANSAS PUBLIC SERVICE COMMISSION

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FILED

IN THE MATTER OF THE APPLICATION OF )  
NPCR, INC. D/B/A NEXTEL PARTNERS FOR )  
DESIGNATION AS AN ELIGIBLE )  
TELECOMMUNICATIONS CARRIER )  
PURSUANT TO SECTION 214(e)(2) OF THE )  
COMMUNICATIONS ACT OF 1934, AS AMENDED )

DOCKET NO. 03-141-U  
ORDER NO. 4

ORDER

On August 28, 2003, NPCR, Inc. d/b/a Nextel Partners ("Nextel") initiated this docket by filing a petition for designation as an eligible telecommunications carrier ("ETC") pursuant to section 214(e)(2) of the Federal Communications Act of 1934 as amended<sup>1</sup>, ("the Federal Act"). Nextel's petition asserts that the Arkansas Public Service Commission ("APSC" or "this Commission") has established procedures for designation as an ETC<sup>2</sup> and that Nextel has complied with those procedures.

Nextel states that it is a commercial mobile radio service common carrier<sup>3</sup> and seeks designation as an ETC for certain specified wire centers in a Southwestern Bell Telephone Company study area.<sup>4</sup> Nextel asserts that, pursuant to § 214(e)(2) of the Federal Act and consistent with this Commission's Order in Docket No. 97-326-U, the Commission must designate more than one common carrier as an ETC in non-rural service areas as long as each carrier requesting ETC status meets the requirements of § 214(e)(2) of the Federal Act.

In support of its petition, Nextel offers the affidavit of Donald J. Manning, Vice President and General Counsel for Nextel. Mr. Manning's affidavit asserts that Nextel is able to offer all

<sup>1</sup> 47 U.S.C. § 214 (e)(2)

<sup>2</sup> See *in the Matter of Determining Eligible Telecommunications Carriers in Arkansas*, Order No. 1, Docket 97-326-U (August 15, 1997)

<sup>3</sup> Also referred to as a wireless or cellular carrier

<sup>4</sup> See attachment 1, exhibit A to Nextel's petition

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services and functionality required by 47 CFR § 54.101(a) to its customers using its own facilities in the Southwestern Bell wire center areas. Specifically, Nextel states that it is able to offer voice grade access to the public switched network, local usage, dual tone multi-frequency signaling or its functional equivalent, single-party service or its functional equivalent, access to emergency service, access to operator services, access to interexchange service, access to directory assistance, and toll limitation for qualifying low-income consumers. The affidavit states that Lifeline and Linkup programs, which can only be offered by ETCs, and toll blocking for Lifeline subscribers, will be made available when Nextel receives an ETC designation.

Three sets of comments were filed on September 29, 2003 by three groups of incumbent local exchange carriers ("ILECs")<sup>5</sup> The rural ILECs argue that wireless carriers are essentially unregulated in Arkansas and do not provide their customers with the protections provided in the APSC's Telecommunications Provider Rules because wireless carriers are not subject to those rules. The rural ILECs argue that, because wireless carriers are not subject to the APSC's Telecommunications Provider Rules, it may not be in the public interest to approve Nextel's ETC request.

The rural ILECs also argue that if Nextel takes a customer from an ILEC, the rural ILECs would lose terminating access charges which would have been paid to rural ILECs for terminating the toll calls of the customer taken by Nextel. The rural ILECs acknowledge that Nextel would pay terminating access charges to rural ILECs for termination of toll calls from

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<sup>5</sup> The commenting parties are three groups of ILECS which will be referred to as (1) "the rural ILECS", which consist of Arkansas Telephone Company, Inc., Central Arkansas Telephone Cooperative, Inc.; Madison County Telephone Company, Magazine Telephone Company, Northern Arkansas Telephone Co., Pinnacle Communications, Prairie Grove Telephone Company, Rice Belt Telephone Company; South Arkansas Telephone Company, Inc., Southwest Arkansas Telephone Cooperative, Inc., Walnut Hill Telephone Company, and Yell County Telephone Company (2) "the Ritter companies", which consist of Ritter Communications Holdings, Inc. on behalf of its wholly owned subsidiaries Ritter Telephone Company and Tri-County Telephone Company, along with Yelcot Telephone Company and Mountain View Telephone Company and (3) "the CenturyTel companies" which consist of CenturyTel of Central Arkansas, LLC; CenturyTel of Northwest Arkansas, LLC, CenturyTel of Arkansas, Inc., CenturyTel of Mountain Home, Inc., CenturyTel of Redfield, Inc.; CenturyTel of South Arkansas, Inc.; Cleveland County Telephone Company, Inc., and Decatur Telephone Company, Inc.

Nextel customers, however, the rural ILECs assert that the terminating access rates paid by wireless carriers are substantially less than those paid by other ILECs, such as Southwestern Bell, and the resulting reduction in access charges paid to the rural ILECs could affect their profitability and lead to rate increases for the customers of the rural ILECS.

The Ritter companies argue that ACA § 23-17-405(b) (5) provides that Nextel may not be designated as an ETC unless "it is determined by the Commission that the designation is in the public interest" and that Nextel is not entitled to an automatic grant of ETC status. The Ritter companies state that Nextel has failed to demonstrate that ETC designation for Nextel is in the public interest and that Nextel has not shown that competition will be materially increased or that new or advanced services will be delivered sooner as a result of Nextel receiving ETC designation. The Ritter companies assert that granting ETC status to Nextel could detrimentally effect the Federal Universal Service Fund, ("USF"), because the USF is funded by assessments on telecommunications providers' interstate revenue and as the size of the USF grows, as a result of commercial mobile radio service providers receiving ETC status, the customers of the Ritter companies will be charged increasing amounts to fund the USF and will receive no demonstrable benefit

The Ritter companies also argue that CMRS providers are not subject to the same quality of service standards as ILECs and are not required to act as a provider of last resort. The Ritter companies assert that the lack of these protections for Nextel's customers leads to the conclusion that Nextel's designation as an ETC is not in the public interest.

The Ritter companies' comments also point out the continuing activity by the Federal-State Joint Board on Universal Service ("Joint Board") and the United States House of Representatives Energy and Commerce Committee which are reviewing the operations of the USF. The Ritter companies suggest that this Commission wait until the Joint Board and

Congress have completed their reviews of the USF and made any necessary changes before granting ETC status to Nextel

The CenturyTel companies also raise many of the issues that are currently under review by the Joint Board, arguing that the availability of affordable high quality telephone services to consumers is at risk because of the ever-increasing demands on the USF from new carriers being granted ETC status. The CenturyTel companies request that the APSC deny the ETC request and initiate a generic proceeding to examine the policy and factual issues presented by the application or delay any decision until the Joint Board reports its findings regarding the USF to the Federal Communications Commission ("FCC"). The CenturyTel companies refer to the "spiraling" demands on the USF caused by the influx of ETC applications asserting that Nextel does not need USF support to be competitive and that granting ETC status to carriers that do not need USF support places the USF at risk. The CenturyTel companies note that the Federal Universal Service charge has increased from 6.8 % to 9.3 % on interstate revenue over the past two years and note that this issue is currently under review by the Joint Board.

The CenturyTel companies also argue that, when a carrier like Nextel receives an ETC designation, it can increase its revenues through USF support funds regardless of whether it adds any additional customers or obtains any customers from the ILEC serving the same area. CenturyTel suggests that this ability to artificially inflate revenues through Federal USF support when it cannot be shown that the revenues are needed is contrary to the public interest.

The CenturyTel companies claim that Nextel has not shown that it is able to provide service in the entire study area, i.e., the geographical area for which Nextel seeks ETC status, and argue that the FCC rules which require wireless ETCs to use the customer billing address for the purpose of identifying the service location provides an opportunity for customers to misuse the service by obtaining service using a billing address within the ETC designated area, but using

the service primarily within the service area of a rural ILEC. The CenturyTel companies argue that the Commission should hold all pending ETC applications in abeyance until the FCC has an opportunity to consider the Joint Board recommendations on the issues raised by the CenturyTel companies in their comments

The CenturyTel companies' comments also reiterate the arguments previously made asserting that when a wireless ETC captures a customer from an existing ILEC, the amount of access revenues received by ILECs terminating calls for the wireless ETC is less than the amount of terminating access which the ILEC would have received if it had terminated the call from another ILEC customer, thereby reducing the amount of access revenues available to the ILECs. The CenturyTel companies also argue that Nextel is not required to serve as a carrier of last resort and is not subject to the APSC's Telecommunications Provider Rules. The CenturyTel companies assert that because the Telecommunications Provider Rules are not applicable to Nextel, Nextel customers would not be able to file formal complaints and that the Commission could not require credits or refunds for service interruptions, billing errors or failure to provide service. The CenturyTel companies state that Nextel's rates are not subject to investigation by this Commission and that Nextel's customers deserve the protections of the Commission's Telecommunications Provider Rules. The CenturyTel companies assert that because Nextel is currently providing service in the area in which it seeks ETC designation, this Commission should conclude that adequate competition exists in the area and that it is not in the public interest to designate Nextel as an ETC since such designation would not further promote competition.

Nextel's response to the comments filed by the ILECs asserts that it has met all of the criteria set forth in the Federal Act and this Commission's previous orders regarding ETC designation. Nextel emphasizes that it is not seeking ETC designation in any area served by a

rural telecommunications company. Nextel argues that the Federal Act requires this Commission to provide Nextel with an ETC designation if it meets the qualifications set forth in 47 USC § 214(e)(1) and 47 CFR § 54.201(d). Nextel asserts that it has met those requirements and this Commission must, therefore, provide an ETC designation to Nextel. Nextel argues that FCC precedent holds that designation of an ETC in non-rural territory per se satisfies the public interest requirement, citing *In the Matter of Federal-State Joint Board on Universal Service; Farmer's Cellular Telephone, Inc Petition for a Designation as an Eligible Telecommunication Carrier*, 18 FCC Rod 3848 (released March 12, 2003).

Although the comments raise significant public policy issues, those issues are properly being addressed at the Congressional level and at the Federal Communications Commission. To the extent comments raise public policy issues such as the potential expansion of the Federal Universal Service Fund, these matters of public policy should be addressed at the Federal level and should not effect this Commission's decision in this case for two reasons. First, this Commission has no jurisdiction to make changes in the Federal USF or the laws under which the Federal USF is established, and, second, this Commission is obliged to follow the requirements of Arkansas law which require this Commission to act consistently with the Federal Act.

ACA § 23-17-405 provides that the Commission may designate other telecommunications providers to be eligible for high-cost support consistent with 47 USC § 214(e) (2). This grant of authority to the Commission is conditioned on the telecommunications provider accepting responsibility to provide service to all customers in the ILEC's local exchange area through its own facilities or a combination of facilities, and the support will not begin until the telecommunications provider has the facilities in place to serve the area. The telecommunications provider may only receive funding for the portion of its facilities that it owns and maintains, the telecommunications provider must advertise the availability and



charges for its services, and the Commission must determine that the designation is in the public interest.

47 USC § 214(e)(2) states that

A State Commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State Commission. Upon request and consistent with the public interest, convenience, and necessity, the State Commission may in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State Commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State Commission shall find that the designation is in the public interest

(Emphasis added).

Nextel seeks ETC designation in an area served by a non-rural telephone company. Section 214(e)(2) clearly directs the Commission to designate more than one common carrier as an ETC if the requirements of paragraph (1) are met. Sections 214 (e)(1)(A) and (B) require that the carrier seeking ETC status must “offer the services that are supported by Federal Universal Service support mechanisms under § 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier); and advertise the availability of such services and the charges therefore using media of general distribution.) The affidavit submitted by Nextel clearly indicates that Nextel has, or upon receiving ETC designation will, offer the services required and advertise the availability of those services in compliance with § 214(e)(1) and § 254(c) thereby meeting the requirements of § 214(e)(2) of the Federal Act.

ACA § 23-17-405 requires this Commission to act in a manner which is “consistent with § 214(e)(2) of the Federal Act .” The fact that Nextel has agreed to comply with § 214(e) in

obtaining ETC designation in an area served by a non-rural carrier is sufficient to determine that granting ETC status is consistent *per se* with the public interest. *In the Matter of Federal-State Joint Board on Universal Service, Farmer's Cellular Telephone, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, 18 FCC Rcd 3848 (released March 12, 2003); *Cellco Partnership d/b/a Bell Atlantic Mobile Petitioned for Designation as an Eligible Telecommunications Carrier*, 16 FCC Rcd 39, ¶ 14 (2000); *Pine Belt Cellular and Pine Belt PCS, Inc. Petition for Designation as an Eligible Telecommunications Carrier*, 17 Rcd 9589, ¶ 13 (2002)

In adopting the Telecommunications Regulatory Reform Act of 1997(ACA § 23-17-401 *et seq.*), the General Assembly stated that its intent was to provide for a system of regulation, consistent with the Federal Act, that assists in implementing the national policy of opening the telecommunications market to competition on fair and equal terms. Many of the objections made to the granting of ETC status by the commenting parties suggest that the granting of ETC status could affect the profitability of those companies and possibly result in rate increases to their customers. They therefore argue that it is not in the public interest and is inconsistent with Arkansas law to approve the ETC request. This argument ignores the statutory intent to implement competition, which will obviously have an affect on the profitability of some companies, but will also provide competitive alternatives to customers. If the ILECs receive reduced terminating access charges from the contracts they have negotiated with wireless carriers, they should receive the benefit of paying reduced access charges for terminating their calls to the wireless networks. Additionally, the terminating access rates paid between ILECs and wireless carriers are negotiated rates which the ILECs have agreed to pay. The contracts between the ILECs and wireless carriers should not, therefore, provide a basis to deny ETC status to a wireless carrier.

The suggestion by the ILECs that granting ETC status could affect their profits and their customers' rates does not suggest that granting ETC status is not in the public interest. The granting of ETC status to Nextel will provide a competitive alternative for customers in the Southwestern Bell area in which Nextel seeks to provide service. The effect on the ILECs in Arkansas, resulting from the funding of the USF through assessments on all carriers' interstate services, is essentially the same regardless of whether an ETC request is granted in Arkansas or by another state commission. There will be some effect on amounts paid by Arkansas ILECs, since all carriers' interstate revenues are assessed to support the USF; however, denying the request would prohibit a group of Arkansas consumers from having the competitive alternatives available to customers in other states even though those Arkansas consumers would be indirectly paying for the benefits to customers in other states through payments for interstate services which originate or terminate in Arkansas.

To the extent that the commenting parties have suggested that the Commission delay its decision pending resolution of some of the issues raised in the comments and currently pending or under consideration in United States Congressional committees or before the FCC's Joint Board, the request to delay would be inconsistent with the requirements of 47 USC § 214 (e)(2) which states that the Commission "shall" grant the ETC request if the requirements of the statute are met. Additionally, the issues raised by the commenting parties are best dealt with in the appropriate forums which have the jurisdiction to effect any changes which might be deemed necessary

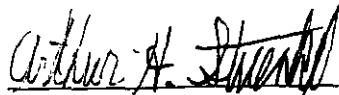
The commenting parties also argue that the ETC designation, if granted, should be conditioned on Nextel's agreement to submit to this Commission's jurisdiction for enforcement of the Commission's Telecommunications Provider Rules. This recommendation appears to be inconsistent with the requirements of ACA § 23-17-411(g), which substantially limits the

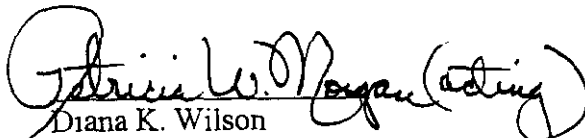
Commission's jurisdiction over commercial mobile radio services. The recommendation also lacks support under § 214(e) which requires the Commission to grant ETC status if the conditions set forth in the statute are met

In view of the foregoing, the request by NPCR, Inc.d/b/a Nextel Partners for ETC status in the exchanges of Southwestern Bell Telephone Company-Arkansas (study area code 405211) is hereby granted.


BY ORDER OF THE PRESIDING OFFICER PURSUANT TO DELEGATION.

This 22<sup>nd</sup> day of December, 2003.

  
Arthur H. Stuenkel  
Presiding Officer

  
Diana K. Wilson  
Secretary of the Commission

I hereby certify that the following order issued by the Arkansas Public Service Commission has been served on all parties of record this date by the U S mail with postage prepaid, using the address of each party as indicated in the official docket file

  
Diana K. Wilson

Secretary of the Commission

Date 12-22-2003

**Non-Rural LEC Wire Centers:**  
**SAC 405211 Southwestern Bell-AR**

05ALTHARMA	05LTRKARCA	05SPDLARPL
05ARKDARMA	05LTRKAREA	05SRCYARMA
05BAXTARBX	05LTRKARFR	05STRNARMA
05BEEBARMA	05LTRKARLO	05VNBRARMA
05BNTNARMA	05LTRKARMO	
05BNTNARNO	05LTRKARSK	
05BNTVARBV	05LTRKARSW	
05BNTVARCR	05LTRKARTE	
05BRNKARMA	05LTRKARTO	
05CLEVARMA	05LTRKARTU	
05CMDNARSH	05LTRKARTW	
05CNWYARMA	05LTRKARUL	
05CNWYARMY	05LTRKARVA	
05ELDOARMA	05LTRKARVI	
05FTSMARGL	05LTRKARWI	
05FTSMARMI	05LTRKARYO	
05FTSMARSU	05MLTNARFL	
05FYVLARHI	05MLTNARPA	
05GRDNARMA	05MLVRARMA	
05GRVTARMA	05MNTIARMA	
05HOPEARMA	05NTRDARMA	
05HTSPARCO	05PARNARMA	
05HTSPARLA	05PNBLARCH	
05HTSPARNA	05PNBLARJE	
05HTSPARRO	05PNBLARWC	
05JSVLARDE	05RGRSAREA	
05LNDLARMA	05RGRSARMA	
05LONKARNB	05SPDLARFO	

ARKANSAS PUBLIC SERVICE COMMISSION

DEC 31 12 03 PM '03

IN THE MATTER OF THE APPLICATION OF )  
ALLTEL COMMUNICATIONS, INC. FOR )  
DESIGNATION AS AN ELIGIBLE )  
TELECOMMUNICATIONS CARRIER PURSUANT )  
TO SECTION 214(e)(2) OF THE )  
COMMUNICATIONS ACT OF 1934 )

FILED  
DOCKET NO 03-138-U  
ORDER NO. 5

ORDER

On August 14, 2003, ALLTEL Communications, Inc. ("ALLTEL") filed an application for designation as an Eligible Telecommunications Carrier ("ETC") pursuant to § 214(e)(2) of the Communications Act of 1934, as amended<sup>1</sup>. ALLTEL seeks ETC designation for Federal Universal Service Fund ("USF") support throughout its licensed service areas in the State of Arkansas in wire centers served by SBC<sup>2</sup>; CenturyTel of Northwest Arkansas, LLC; and CenturyTel of Central Arkansas, LLC (together "CenturyTel"). ALLTEL provides Commercial Mobile Radiotelephone Service ("CMRS")<sup>3</sup> in Arkansas Cellular Market Areas ("CMAs") 92 (Little Rock/North Little Rock), 165 (Fort Smith), 182 (Fayetteville/Springdale), 291 (Pine Bluff), and Arkansas Rural Service Areas ("RSAs") 1-12 (CMAs 324-331). ALLTEL proposes to advertise and provide the USF supported services designated in 47 U.S.C. § 214(e)(6). In support of its application ALLTEL has submitted the affidavit of Steve R. Mowery, Vice President, State Government Affairs for ALLTEL, certifying that ALLTEL will advertise and provide the required services. In accordance with Order No. 3 of this docket comments were

<sup>1</sup> 47 U.S.C. § 214(e)(6)

<sup>2</sup> Referring to Southwestern Bell Telephone LP

<sup>3</sup> Also referred to as wireless or cellular service

filed on October 3, 2003 by three groups of incumbent local exchange carriers ("ILECS")<sup>4</sup>, and reply comments were filed by ALLTEL on October 10, 2003. In accordance with Order No. 4 of this docket, a hearing was held on November 5, 2003 and post hearing briefs were filed on November 26, 2003.

The rural ILECs argue that if ALLTEL takes a customer from an ILEC, the rural ILECs will lose terminating access charges which would have been paid to rural ILECs for terminating the toll calls of the customer taken by ALLTEL. The rural ILECs acknowledge that ALLTEL would pay terminating access charges to rural ILECs for termination of toll calls from ALLTEL customers, however, the rural ILECs assert that the terminating access rates paid by wireless carriers are substantially less than those paid by other ILECs or interexchange carriers ("IXCs"), and the resulting reduction in access charges paid to the rural ILECs could affect their profitability. The rural ILECs also assert that some ILECs have no agreement with CMRS carriers for termination of minutes and receive no revenue from CMRS carriers, including ALLTEL. The rural ILECs state that, "As wireless carriers capture market share in Arkansas, the revenue of each of the ILECs decline as traffic is moved from ILEC to ILEC or IXC to ILEC to CMRS to ILEC."<sup>5</sup> However, the rural ILECs also state that, "Even if Alltel Wireless is not an

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<sup>4</sup> The commenting parties are three groups of ILECS which will be referred to as (1) "the rural ILECS", which consist of Arkansas Telephone Company, Inc.; Central Arkansas Telephone Cooperative, Inc.; Madison County Telephone Company, Magazine Telephone Company, Northern Arkansas Telephone Co.; Pinnacle Communications; Prairie Grove Telephone Company; Rice Belt Telephone Company; South Arkansas Telephone Company, Inc.; Southwest Arkansas Telephone Cooperative, Inc.; Walnut Hill Telephone Company, and Yell County Telephone Company (2) "the Ritter companies", which consist of Ritter Communications Holdings, Inc. on behalf of its wholly owned subsidiaries Ritter Telephone Company and Tri-County Telephone Company, along with Yelcot Telephone Company and Mountain View Telephone Company and (3) "the CenturyTel companies" which consist of CenturyTel of Central Arkansas, LLC, CenturyTel of Northwest Arkansas, LLC, CenturyTel of Arkansas, Inc., CenturyTel of Mountain Home, Inc., CenturyTel of Redfield, Inc.; CenturyTel of South Arkansas, Inc., Cleveland County Telephone Company, Inc., and Decatur Telephone Company, Inc.

<sup>5</sup> Initial Comments of Various Rural ILECs, p. 2, filed Oct. 3, 2003

ETC in the Rural ILECs' area the loss of revenue occurs."<sup>6</sup> The rural ILECs argue that wireless carriers offering of toll minutes in wireless plans could require the rural ILECS to expend money to carry the additional traffic volume, further detracting from their profitability, and that wireless carriers are essentially unregulated in Arkansas and do not provide their customers with the protections provided in the Arkansas Public Service Commission ("APSC" or "this Commission") Telecommunications Provider Rules because wireless carriers are not subject to those rules. The rural ILECs argue that because wireless carriers are not subject to the APSC's Telecommunications Provider Rules, and an ETC designation could result in lost toll or access revenues, and an ETC designation would require additional USF funding, it is not in the public interest to approve ALLTEL's ETC request.

The Ritter companies assert that granting ETC status to ALLTEL could detrimentally effect the USF, because the USF is funded by assessments on telecommunications providers' interstate revenue and as the size of the USF grows, as a result of commercial mobile radio service providers receiving ETC status, the customers of the Ritter companies will be charged increasing amounts to fund the USF and will receive no demonstrable benefit.

The Ritter companies also argue that CMRS providers are not subject to the same quality of service standards as ILECs and are not required to serve as a provider of last resort. The Ritter companies assert that the lack of these protections for ALLTEL's customers leads to the conclusion that ALLTEL's designation as an ETC is not in the public interest.

The Ritter companies' comments also point to the continuing activity by the Federal-State Joint Board on Universal Service ("Joint Board") and the United States House of Representatives Energy and Commerce Committee which are reviewing the operations of the

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<sup>6</sup> Id



USF. The Ritter companies suggest that this Commission wait until the Joint Board and Congress have completed their reviews of the USF and make any necessary changes before granting ETC status to ALLTEL. The Ritter companies also question how ALLTEL will determine whether customers in certain exchanges are in fact CenturyTel or SBC customers, or Ritter customers, since Ritter has customers who have mailing addresses in towns with wire centers served by CenturyTel or SBC.<sup>7</sup>

The CenturyTel companies also raise many of the issues that are currently under review by the Joint Board, arguing that the availability of affordable high quality telephone services to consumers is at risk because of the ever-increasing demands on the USF from new carriers being granted ETC status. The CenturyTel companies request that the APSC deny the ETC request and initiate a generic proceeding to examine the policy and factual issues presented by the application or delay any decision until the Joint Board reports its findings regarding the USF to the Federal Communications Commission ("FCC"). The CenturyTel companies refer to the "spiraling" demands on the USF caused by the influx of ETC applications asserting that ALLTEL does not need USF support to be competitive and that granting ETC status to carriers that do not need USF support places the USF at risk.

The CenturyTel companies also argue that, when a carrier like ALLTEL receives an ETC designation, it can increase its revenues through USF support funds regardless of whether it adds any additional customers or obtains any customers from the ILEC serving the same area. CenturyTel suggests that this ability to artificially inflate revenues through Federal USF support when it cannot be shown that the revenues are needed is contrary to the public interest.

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<sup>7</sup> Comments of Ritter Communications, ¶ 8, filed Oct. 3, 2003

The CenturyTel companies claim that ALLTEL has not shown that it is able to provide service in the entire study area of the effected ILECs, that ALLTEL is not required to serve as a carrier of last resort and is not subject to the APSC's Telecommunications Provider Rules. CenturyTel therefore asserts that it is not in the public interest to grant the ETC request

ALLTEL's response to the comments filed by the ILECs asserts that it has met all of the criteria set forth in the Federal Act regarding ETC designation. ALLTEL emphasizes that differences in the manner in which ILECs and CMRS providers are regulated does not effect the specific requirements of the Federal Act regarding ETC designation.

Concerning the comments on how ALLTEL will determine a customer's location, Alltel notes that 47 C.F.R. § 54.307 requires that "Carriers providing wireless mobile service in an incumbent LEC's service shall use the customer's billing address for purposes of identifying the service location of a wireless customer in a service area " ALLTEL argues that it must comply with the cited provision and the argument against using that methodology therefore lacks merit

ALLTEL also asserts that it is inappropriate to wait until a decision of the FCC or a congressional committee which may or may not take place at some future date, and that the benefits of competitive choice, mobility, larger calling scopes and improved network capability to Arkansas consumers provide sufficient benefits to determine that granting the ETC request is in the public interest.

Although the comments raise significant public policy issues, those issues are properly being addressed at the Congressional level and at the Federal Communications Commission. To the extent comments raise public policy issues such as the potential expansion of the Federal Universal Service Fund, these matters of public policy should be addressed at the Federal level and should not effect this Commission's decision in this case for two reasons.

First, this Commission has no jurisdiction to make changes in the Federal USF or the laws under which the Federal USF is established, and, second, this Commission is obliged to follow the requirements of Arkansas law which require this Commission to act consistently with the Federal Act. A.C.A. § 23-17-405 provides that the Commission may designate other telecommunications providers to be eligible for high-cost support consistent with 47 U.S.C. § 214(e) (2). This grant of authority to the Commission is conditioned on the telecommunications provider accepting responsibility to provide service to all customers in the ILEC's local exchange area through its own facilities or a combination of facilities, and the support will not begin until the telecommunications provider has the facilities in place to serve the area. The telecommunications provider may only receive funding for the portion of its facilities that it owns and maintains, the telecommunications provider must advertise the availability and charges for its services, and the Commission must determine that the designation is in the public interest.

There are essentially two issues presented in this docket. The first issue concerns ALLTEL's application for ETC status in areas served by SBC, a non-rural telephone company. The second issue concerns ALLTEL's request for ETC designation in the CenturyTel areas. CenturyTel is a rural telephone company as that term is used in 47 U.S.C. § 214(e)(6). Both CenturyTel and SBC are Tier 1 companies as that term is defined at A.C.A. § 23-17-403(26)(A) and used at A.C.A. § 23-17-405(d)(1).

A.C.A. § 23-17-405(b) states that this Commission may designate other telecommunications providers to be eligible for high-cost support, except in areas served by a rural telephone company, consistent with 47 U.S.C. § 214(e)(2). A.C.A. § 23-17-405 (d)(1) requires that, "For the entire area served by a rural telephone company, excluding tier one companies . . . there shall be only one (1) eligible telecommunications carrier. . . ." Since both

SBC and CenturyTel are Tier 1 carriers, the single carrier requirement of A.C.A. § 23-17-405 (d)(1) is inapplicable and the issues are governed by the provisions of §23-17-405 (d)(1) which requires consistency with 47 U.S.C. §214(e)(2).

47 U.S.C. § 214(e)(2) states that:

A State Commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State Commission. Upon request and consistent with the public interest, convenience, and necessity, the State Commission may in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State Commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State Commission shall find that the designation is in the public interest.

(Emphasis added)

To the extent that ALLTEL seeks ETC designation in an area served by a non-rural telephone company, Section 214(e)(2) clearly directs the Commission to designate more than one common carrier as an ETC if the requirements of paragraph (1) are met. Sections 214 (e)(1)(A) and (B) require that the carrier seeking ETC status must “offer the services that are supported by Federal Universal Service support mechanisms under § 254(c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier); and advertise the availability of such services and the charges therefore using media of general distribution. The affidavit submitted by ALLTEL clearly indicates that ALLTEL has, or upon receiving ETC designation will, offer the services required and advertise the availability of those

services in compliance with § 214(e)(1) and § 254(c) thereby meeting the requirements of § 214(e)(2) of the Federal Act.

The comments suggest that an ETC should provide service to all customers in an ILEC's area. It should be noted that even the ILECs do not have the facilities in place to serve all customers, particularly those in remote areas, of their allocated territories. This fact was clearly recognized by the Arkansas Legislature in adopting an extension of facilities fund to extend telecommunications facilities to unserved customers.<sup>8</sup> The FCC has also addressed this argument stating:

We believe that interpreting section 214(e)(1) to require the provision of service throughout the service area prior to ETC designation prohibits or has the effect of prohibiting the ability of competitive carriers to provide telecommunications service, in violation of section 253 (a) of the Act. We find that such an interpretation of section 214(e)(1) is not competitively neutral, consistent with section 254, and necessary to preserve and advance universal service, and thus does not fall within the authority reserved to the states in section 253(b). In addition, we find that such a requirement conflicts with section 214(e) and stands as an obstacle to the accomplishment and execution of the full purpose and objectives of Congress as set forth in section 254. Consequently, under both the authority of section 253(d) and traditional federal preemption authority, we find that to require the provision of service throughout the service area prior to designation effectively precludes designation of new entrants as ETCs in violation of the intent of Congress.<sup>9</sup>

A.C.A § 23-17-405 requires this Commission to act in a manner which is "consistent with § 214(e)(2) of the Federal Act . . ." FCC precedent holds that the fact that ALLTEL has agreed to comply with § 214(e) in obtaining ETC designation in an area served by a non-rural carrier is sufficient to determine that granting ETC status is consistent *per se* with the public interest. *In the Matter of Federal-State Joint Board on Universal Service, Farmer's Cellular Telephone, Inc*

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<sup>8</sup> Act 1771 of 2001, A.C.A. §23-17-404 (e)(7)

<sup>9</sup> In the Matter of Federal-State Joint Board on Universal Service, Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission, ¶ 2, CC Docket No. 96-45, adopted July 11, 2000, FCC 00-248

*Petition for Designation as an Eligible Telecommunications Carrier*, 18 FCC Rcd 3848 (released March 12, 2003); *Cellco Partnership d/b/a Bell Atlantic Mobile Petitioned for Designation as an Eligible Telecommunications Carrier*, 16 FCC Rcd 39, ¶ 14 (2000); *Pine Belt Cellular and Pine Belt PCS, Inc Petition for Designation as an Eligible Telecommunications Carrier*, 17 Rcd 9589, ¶ 13 (2002).

In adopting the Telecommunications Regulatory Reform Act of 1997(A.C.A § 23-17-401 *et seq* ), the General Assembly stated that its intent was to provide for a system of regulation, consistent with the Federal Act, that assists in implementing the national policy of opening the telecommunications market to competition on fair and equal terms. Many of the objections made to the granting of ETC status by the commenting parties suggest that the granting of ETC status could affect the profitability of those companies and possibly result in rate increases to their customers. They therefore argue that it is not in the public interest and is inconsistent with Arkansas law to approve the ETC request. This argument ignores the statutory intent to implement competition, which will obviously have an affect on the profitability of some companies, but will also provide competitive alternatives to customers. If the ILECs receive reduced terminating access charges from the contracts they have negotiated with wireless carriers, they should receive the benefit of paying reduced access charges for terminating their calls to the wireless networks. Additionally, the terminating access rates paid between ILECs and wireless carriers are negotiated rates which the ILECs have agreed to pay. The contracts between the ILECs and wireless carriers should not, therefore, provide a basis to deny ETC status to a wireless carrier.

The suggestion by the ILECs that granting ETC status could affect their profits and their customers' rates does not suggest that granting ETC status is not in the public interest. The

granting of ETC status to ALLTEL will provide a competitive alternative for customers in the area in which ALLTEL seeks to provide service. The effect on the ILECs in Arkansas, resulting from the funding of the USF through assessments on all carriers' interstate services, is essentially the same regardless of whether an ETC request is granted in Arkansas or by another state commission. There will be some effect on amounts paid by Arkansas ILECs, since all carriers' interstate revenues are assessed to support the USF, however, denying the request would prohibit a group of Arkansas consumers from having the competitive alternatives available to customers in other states even though those Arkansas consumers would be indirectly paying for the benefits to customers in other states through payments for interstate services which originate or terminate in Arkansas.

To the extent that the commenting parties have suggested that the Commission delay its decision pending resolution of some of the issues raised in the comments and currently pending or under consideration in United States Congressional committees or before the FCC's Joint Board, the request to delay would be inconsistent with the requirements of 47 U.S.C. § 214 (e)(2) which states that the Commission "shall" grant the ETC request if the requirements of the statute are met. Additionally, the issues raised by the commenting parties are best dealt with in the appropriate forums which have the jurisdiction to effect any changes which might be deemed necessary.

The commenting parties also argue that the ETC designation, if granted, should be conditioned on ALLTEL's agreement to submit to this Commission's jurisdiction for enforcement of the Commission's Telecommunications Provider Rules. This recommendation appears to be inconsistent with the requirements of A.C.A § 23-17-411(g), which substantially limits the Commission's jurisdiction over commercial mobile radio services. The

recommendation also lacks support under § 214(e) which requires the Commission to grant ETC status if the conditions set forth in the statute are met. In construing §214 (e) the FCC has stated:

We conclude that section 214 (e)(2) does not permit the Commission or the states to adopt additional criteria for designation as an eligible telecommunications carrier. As noted by the Joint Board, "[s]ection 214 contemplates that any telecommunications carrier that meets the eligibility criteria of section 214 (e)(1) *shall* be eligible to receive universal service support." Section 214 (e)(2) states that "[a] state commission *shall* . . . designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier . . . . Section 214(e)(2) further states that " . . .the State commission *may*, in the case of an area served by a rural telephone company and *shall*, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, *so long as each additional requesting carrier meets the requirements of paragraph (1).*" Read together, we find that these provisions dictate that a state commission must designate a common carrier as an eligible carrier if it determines that the carrier has met the requirements of section 214(e)(1). Consistent with the Joint Board's finding, the discretion afforded a state commission under section 214(e)(2) is the discretion to decline to designate more than one eligible carrier in an area that is served by a rural telephone company; in that context, the state commission must determine whether the designation of an additional eligible carrier is in the public interest.<sup>10</sup>

The difference between the request to provide service in SBC territory and the request to provide service in CenturyTel territories lies in the fact that CenturyTel is a rural telephone company. 47 U.S.C. § 214(e)(6) provides that the Commission may, with respect to an area served by a rural telephone company, designate more than one ETC and requires that the Commission determine that such designation is in the public interest. Likewise, A.C.A. § 23-17-405(b)(5) requires the Commission to determine that ETC designation is in the public interest. The "shall" provision in the Federal Statute is not applicable in determining whether ETC status should be granted in a rural telephone company territory.

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<sup>10</sup> In the Matter of Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, adopted May 7, 1997 ¶ 135, FCC 97-157 (Also see id at ¶ 142)



In determining whether to grant ETC status to ALLTEL in the areas served by CenturyTel a determination must be made of whether such a grant is in the public interest. The ILECs comments suggest that the potential harm to the ILECs, and possibly their customers, outweighs any benefits the customers may gain by having a competing ETC. ALLTEL's witness Mr. Krajci stated that ALLTEL's local calling area is "basically statewide." If ALLTEL is granted ETC status, customers, particularly Lifeline and Linkup customers, will have the benefits of a substantially increased local calling area. This could serve to reduce their toll bills and could make the service offered by an alternative ETC much more economically desirable. ALLTEL also asserts that its customers will have the benefit of mobility which the existing ETC does not currently provide. Granting ETC status to ALLTEL would also help open the telecommunications market to competition on fair and equal terms, consistent with the legislative intent of Act 77. The FCC has also stated that wireless carriers could potentially offer service at much lower cost than traditional wire line service, particularly in rural areas<sup>11</sup>.

As for the potential harm to the ILECs resulting from the increased cost to the Universal Service Fund, ALLTEL notes that, for the 4<sup>th</sup> quarter of 2002, all competitive ETCs, both wireless and wire line, received only about 7% of the total USF disbursement. Therefore, it is logical to conclude that the impact on the USF from granting ALLTEL's application in this docket would be de minimis.

The customers who could benefit from the granting of this ETC request are currently contributing through rates, assuming they currently have telephone services, for the Federal USF. Since the USF is funded from assessments on all interstate services, these customers are

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<sup>11</sup> In the Matter of Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, adopted May 7, 1997 ¶ 190, FCC 97-157

contributing to the costs of ETCs in Arkansas, including the ILECs filing comments in this docket who have ETC status, and are also contributing to the costs of ETCs in other states, just as customers in other states would contribute to carriers granted ETC status in Arkansas. On page 8 of its reply comments ALLTEL cites an order of the Wisconsin Public Service Commission entered on September 9, 2003 in Docket No 7131-T1-101, concerning ALLTEL's application for ETC status in Wisconsin. In that order the Wisconsin Commission notes that 18 other State Commissions and the FCC have approved wireless ETC applications in rural areas. Given that Arkansas consumers are already paying for ETCs in other states, Arkansas Consumers would undoubtedly find it to be in the public interest for them to be allowed the benefits of a competitive ETC that seeks to provide service in areas of Arkansas. As described by ALLTEL witness Mr. Krajci,

...[W]ireless customers do contribute to the Federal Universal Service Fund. And additionally, those costs will be spread not over Arkansas users but over everyone that pays into the Federal USF on a nationwide basis. So to the extent that there are costs associated with ALLTEL receiving Federal support in Arkansas, yes, there are. When one asks who pays for that, actually, all wire line and wireless telephone users in all of the United States pays for that. So the benefit is that what ever cost is associated with Arkansas' customers, the benefit is something greater than that cost.<sup>12</sup>

A determination that granting ETC status to ALLTEL in this proceeding is in the public interest is not merely a "pork barrel local determination."<sup>13</sup> Rather it is a simply recognition of the fact that customers in Arkansas, just as customers in other states, would prefer to share the benefits for which they are paying

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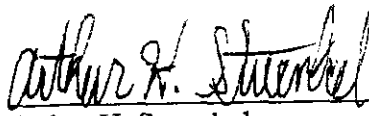
<sup>12</sup> Transcript p 48

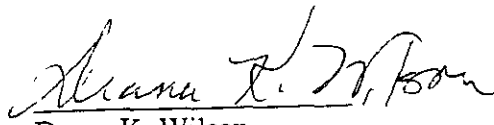
<sup>13</sup> Id at 49

In view of the foregoing the request by ALLTEL Communications, Inc for ETC status in wire centers served by SBC, CenturyTel of Northwest Arkansas, LLC and CenturyTel of Central Arkansas LLC located in cellular market areas 92, 165, 182, 291, and 324-331 is hereby granted

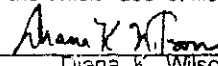
BY ORDER OF THE PRESIDING OFFICER PURSUANT TO DELEGATION

This 31<sup>st</sup> day of December, 2003.

  
Arthur H. Stuenkel  
Presiding Officer

  
Diana K. Wilson  
Secretary of the Commission

I hereby certify that the following order issued by the Arkansas Public Service Commission has been served on all parties of record this date by the U S mail with postage prepaid using the address of each party as indicated in the official docket file

  
Diana K. Wilson

Secretary of the Commission  
Date

12/31/03

**ALLTEL Communications, Inc.**  
**Non-Rural Wire Centers**

COMPANY	COUNTY	WIRE CENTER	CLLI CODE
SOUTHWESTERN BELL	Independence	OIL TROUGH	OLTRARMA
SOUTHWESTERN BELL	Independence	BATESVILLE	BTVLARNO
SOUTHWESTERN BELL	Jackson	GRUBBS	GRBSARMA
SOUTHWESTERN BELL	Jackson	NEWPORT	NWPTARMA
SOUTHWESTERN BELL	Cross	HICKORY RIDGE	HCRGARMA
SOUTHWESTERN BELL	Chicot	MC GEHEE	EUDRARMA
SOUTHWESTERN BELL	Sebastian	FT SMITH	FTSMARSU
SOUTHWESTERN BELL	Sebastian	FT SMITH	FTSMARMI
SOUTHWESTERN BELL	Phillips	W HELENA	HLNAARJU
SOUTHWESTERN BELL	Phillips	HELENA	HLNAARHI
SOUTHWESTERN BELL	Chicot	DERMOTT	DRMTARMA
SOUTHWESTERN BELL	Cleburne	CONCORD	CNCRARMA
SOUTHWESTERN BELL	Cleburne	HEBER SPGS	HBSPARMA
SOUTHWESTERN BELL	Independence	BATESVILLE	BTVLARSO
SOUTHWESTERN BELL	Columbia	MACEDONIA	MCDNARMA
SOUTHWESTERN BELL	Lafayette	STAMPS	STMPARMA
SOUTHWESTERN BELL	Columbia	MAGNOLIA	MGNLARMA
SOUTHWESTERN BELL	Columbia	VILLAGE	VLLGARMA
SOUTHWESTERN BELL	Little River	ASHDOWN	ASHDARMA
SOUTHWESTERN BELL	Columbia	MC NEIL	MCNLARMA
SOUTHWESTERN BELL	Union	MT HOLLY	MTHLARMA
SOUTHWESTERN BELL	Union	EL DORADO	ELDOARMA
SOUTHWESTERN BELL	Union	STRONG	STRNARMA
SOUTHWESTERN BELL	Union	HUTTIG	HTTGARMA
SOUTHWESTERN BELL	Union	EL DORADO	URBNARMA
SOUTHWESTERN BELL	Ouachita	STEPHENS	STPHARMA
SOUTHWESTERN BELL	Nevada	BODCAW	BDCWARMA
SOUTHWESTERN BELL	Hempstead	HOPE	HOPEARMA
SOUTHWESTERN BELL	Union	NORPHLET	NRPHARMA
SOUTHWESTERN BELL	Union	SMACKOVER	SMCKARMA
SOUTHWESTERN BELL	Union	EL DORADO	CALNARMA
SOUTHWESTERN BELL	Ouachita	CAMDEN	CMDNARCU
SOUTHWESTERN BELL	Howard	NASHVILLE	NSVLARMA
SOUTHWESTERN BELL	Ouachita	CAMDEN	CMDNARTE
SOUTHWESTERN BELL	Ouachita	CHIDESTER	CHDSARMA
SOUTHWESTERN BELL	Ashley	HAMBURG	HMBGARMA
SOUTHWESTERN BELL	Ouachita	CAMDEN	CMDNARSH
SOUTHWESTERN BELL	Ashley	MC GEHEE	PTLDARMA
SOUTHWESTERN BELL	Clark	GURDON	GRDNARMA
SOUTHWESTERN BELL	Bradley	WARREN	WRRNARMA
SOUTHWESTERN BELL	Chicot	MC GEHEE	LKVGARMA
SOUTHWESTERN BELL	Drew	WILMAR	WLMRARMA
SOUTHWESTERN BELL	Clark	ARKADELPHIA	ARKDARMA
SOUTHWESTERN BELL	Drew	MONTICELLO	MNTIARMA
SOUTHWESTERN BELL	Polk	MENA	MENARMA

**ALLTEL Communications, Inc.**  
**Non-Rural Wire Centers**

COMPANY	COUNTY	WIRE CENTER	CLLI CODE
SOUTHWESTERN BELL	Desha	MC GEHEE	MCGHARMA
SOUTHWESTERN BELL	Garland	CRYSTAL SPRINGS	CRSPARMA
SOUTHWESTERN BELL	Garland	HOT SPGS NAT PK	HTSPARLA
SOUTHWESTERN BELL	Hot Spring	MALVERN	MLVRARMA
SOUTHWESTERN BELL	Garland	HOT SPRINGS	HTSPARRO
SOUTHWESTERN BELL	Garland	HOT SPRINGS	HTSPARCO
SOUTHWESTERN BELL	Hot Spring	JONES MILL	JNMLARMA
SOUTHWESTERN BELL	Garland	HOT SPGS NAT PK	HTSPARNA
SOUTHWESTERN BELL	Jefferson	PINE BLUFF	PNBLARWC
SOUTHWESTERN BELL	Desha	WATSON	WTSNARMA
SOUTHWESTERN BELL	Lincoln	GRADY	GRDYARMA
SOUTHWESTERN BELL	Jefferson	WHITE HALL	PNBLARCH
SOUTHWESTERN BELL	Jefferson	PINE BLF	PNBLARJE
SOUTHWESTERN BELL	Saline	LONSDALE	LNDLARMA
SOUTHWESTERN BELL	Garland	JESSIEVILLE	JSVLARMA
SOUTHWESTERN BELL	Garland	JESSIEVILLE	JSVLARDE
SOUTHWESTERN BELL	Saline	BENTON	BNTNARMA
SOUTHWESTERN BELL	Saline	BAUXITE	BAXTARBX
SOUTHWESTERN BELL	Jefferson	ALTHEIMER	ALTHARMA
SOUTHWESTERN BELL	Saline	LITTLE ROCK	LTRKARVI
SOUTHWESTERN BELL	Saline	LITTLE ROCK	LTRKARTU
SOUTHWESTERN BELL	Sebastian	FT SMITH	FTSMARGL
SOUTHWESTERN BELL	Saline	PARON	PARNARMA
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARSW
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARTW
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARVA
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARLO
SOUTHWESTERN BELL	Crawford	VAN BUREN	VNBRARMA
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARCA
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARTO
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKAREA
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARYO
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARMO
SOUTHWESTERN BELL	Pulaski	LITTLE ROCK	LTRKARFR
SOUTHWESTERN BELL	Pulaski	N LITTLE ROCK	LTRKARWI
SOUTHWESTERN BELL	Pulaski	N LITTLE ROCK	LTRKARSK
SOUTHWESTERN BELL	Pulaski	N LITTLE ROCK	LTRKARUL
SOUTHWESTERN BELL	Crawford	NATURAL DAM	NTRDARMA
SOUTHWESTERN BELL	Pulaski	SHERWOOD	LTRKARTE
SOUTHWESTERN BELL	Conway	MORRILTON	MLTNARPA
SOUTHWESTERN BELL	Faulkner	CONWAY	CNWYARMY
SOUTHWESTERN BELL	Lonoke	LONOKE	LONKARNB
SOUTHWESTERN BELL	Conway	MORRILTON	MLTNARFL
SOUTHWESTERN BELL	Faulkner	CONWAY	CNWYARMA
SOUTHWESTERN BELL	White	BEEBE	BEEBARMA
SOUTHWESTERN BELL	Conway	CLEVELAND	CLEVARMA

**ALLTEL Communications, Inc.**  
**Non-Rural Wire Centers**

COMPANY	COUNTY	WIRE CENTER	CLLI CODE
SOUTHWESTERN BELL	Conway	CENTER RIDGE	CNRGARMA
SOUTHWESTERN BELL	Lee	MORO	MOROARMA
SOUTHWESTERN BELL	Monroe	FORREST CITY	BRNKARMA
SOUTHWESTERN BELL	Lee	MARIANNA	MRNNARMA
SOUTHWESTERN BELL	Washington	FAYETTEVILLE	FYVLARHI
SOUTHWESTERN BELL	Washington	SPRINGDALE	SPDLARFO
SOUTHWESTERN BELL	White	SEARCY	SRCYARMA
SOUTHWESTERN BELL	Washington	SPRINGDALE	SPDLARPL
SOUTHWESTERN BELL	St Francis	FORREST CITY	FRCYARPA
SOUTHWESTERN BELL	Madison	HINDSVILLE	HNDVARMA
SOUTHWESTERN BELL	St. Francis	FORREST CITY	FRCYARMA
SOUTHWESTERN BELL	Cleburne	GREERS FERRY	GRFYARMA
SOUTHWESTERN BELL	Benton	GRAVETTE	GRVTARMA
SOUTHWESTERN BELL	Benton	BENTONVILLE	BNTVARCR
SOUTHWESTERN BELL	Benton	ROGERS	RGRSARMA
SOUTHWESTERN BELL	St. Francis	HUGHES	HGHSARMA
SOUTHWESTERN BELL	Benton	ROGERS	RGRSAREA
SOUTHWESTERN BELL	Benton	BELLA VISTA	BNTVARBV
SOUTHWESTERN BELL	Cross	WYNNE	WYNNARMA
SOUTHWESTERN BELL	St. Francis	BLACK FISH LAKE	BFLKARMA
SOUTHWESTERN BELL	Carroll	EUREKA SPGS	ERSPARMA
SOUTHWESTERN BELL	Cross	PARKIN	PRKNARMA
SOUTHWESTERN BELL	Cross	CHERRY VLY	CHVYARMA
SOUTHWESTERN BELL	Independence	NEWARK	NWRKARMA
SOUTHWESTERN BELL	Poinsett	HARRISBURG	HRBGARMA
SOUTHWESTERN BELL	Sharp	CAVE CITY	CVCYARMA
SOUTHWESTERN BELL	Craighead	CASH	CASHARMA
SOUTHWESTERN BELL	Mississippi	JOINER	JONRARMA
SOUTHWESTERN BELL	Mississippi	WILSON	WLSNARMA
SOUTHWESTERN BELL	Craighead	JONESBORO	JNBOARMA
SOUTHWESTERN BELL	Lawrence	BLACK ROCK	BLRKARMA
SOUTHWESTERN BELL	Lawrence	WALNUT RDG	WLRGARMA
SOUTHWESTERN BELL	Mississippi	OSCEOLA	OSCLARMA
SOUTHWESTERN BELL	Mississippi	LUXORA	LUXRARMA
SOUTHWESTERN BELL	Greene	PARAGOULD	PRGLARLI
SOUTHWESTERN BELL	Mississippi	DELL	DELLARMA
SOUTHWESTERN BELL	Greene	PARAGOULD	PRGLARCE
SOUTHWESTERN BELL	Mississippi	BLYTHEVILLE	BYVLARPO
SOUTHWESTERN BELL	Greene	PARAGOULD	PRGLARNO
SOUTHWESTERN BELL	Mississippi	BLYTHEVILLE	BYVLARLE

**ALLTEL Communications, Inc.**  
**Tier One Rural Wire Centers**

COMPANY	COUNTY	WIRECENTER	CLLI CODE
CENTURYTEL OF CENTRAL ARKANSAS	Columbia	TAYLOR	TAYLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Columbia	WALDO	WALDARXA
CENTURYTEL OF CENTRAL ARKANSAS	Nevada	ROSTON	RSTNARXA
CENTURYTEL OF CENTRAL ARKANSAS	Hempstead	BLEVINS	BLVNARXA
CENTURYTEL OF CENTRAL ARKANSAS	Nevada	PRESCOTT	PRSCARXA
CENTURYTEL OF CENTRAL ARKANSAS	Arkansas	GILLET	GLLTARXA
CENTURYTEL OF CENTRAL ARKANSAS	Arkansas	HUMPHREY	HMPHARXA
CENTURYTEL OF CENTRAL ARKANSAS	Arkansas	DE WITT	DWTTARXA
CENTURYTEL OF CENTRAL ARKANSAS	Lonoke	ENGLAND	ENLDARXA
CENTURYTEL OF CENTRAL ARKANSAS	Lonoke	ENGLAND	COY ARXA
CENTURYTEL OF CENTRAL ARKANSAS	Arkansas	ALMYRA	ALMYARXA
CENTURYTEL OF CENTRAL ARKANSAS	Arkansas	STUTTGART	STTGARXB
CENTURYTEL OF CENTRAL ARKANSAS	Arkansas	ST CHARLES	STCHARXA
CENTURYTEL OF CENTRAL ARKANSAS	Pulaski	JACKSONVILLE	JCVLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Pulaski	JACKSONVILLE	JCVLARXB
CENTURYTEL OF CENTRAL ARKANSAS	Prairie	ROE	ROE ARXA
CENTURYTEL OF CENTRAL ARKANSAS	Lonoke	CARLISLE	CRLSARXA
CENTURYTEL OF CENTRAL ARKANSAS	Prairie	HAZEN	HAZNARXA
CENTURYTEL OF CENTRAL ARKANSAS	Lonoke	CABOT	CABTARXA
CENTURYTEL OF CENTRAL ARKANSAS	Phillips	MARVELL	MRVLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Prairie	DE VALLS BLUFF	DVBLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Prairie	HICKORY PLAINS	HCPLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Prairie	DES ARC	DSARARXA
CENTURYTEL OF CENTRAL ARKANSAS	White	MCRAE	MCRAARXA
CENTURYTEL OF CENTRAL ARKANSAS	White	GRIFFITHVILLE	GFVLARXA
CENTURYTEL OF CENTRAL ARKANSAS	St. Francis	WHEATLEY	WHTLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Woodruff	COTTON PLANT	CTNPARXA
CENTURYTEL OF CENTRAL ARKANSAS	White	KENSETT	KNSTARXA
CENTURYTEL OF CENTRAL ARKANSAS	White	JUDSONIA	JDSNARXA
CENTURYTEL OF CENTRAL ARKANSAS	Woodruff	AUGUSTA	AGSTARXA
CENTURYTEL OF CENTRAL ARKANSAS	Woodruff	MC CRORY	MCCRARXA
CENTURYTEL OF CENTRAL ARKANSAS	White	BRADFORD	BRFRARXA
CENTURYTEL OF CENTRAL ARKANSAS	Lawrence	STRAWBERRY	JESPARXA
CENTURYTEL OF CENTRAL ARKANSAS	Lawrence	IMBODEN	IMBDARXB
CENTURYTEL OF CENTRAL ARKANSAS	Randolph	POCAHONTAS	PCHNARXA
CENTURYTEL OF CENTRAL ARKANSAS	Fulton	MAMMOTH SPG	MMSPARXA
CENTURYTEL OF CENTRAL ARKANSAS	Greene	DELAPLAINE	DLPLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Randolph	BIGGERS	BGRSARXA
CENTURYTEL OF CENTRAL ARKANSAS	Greene	MARMADUKE	MRMDARXA
CENTURYTEL OF CENTRAL ARKANSAS	Randolph	MAYNARD	MYNRARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	RECTOR	LNRDARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	RECTOR	RCTRARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	SUCCESS	SCCSARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	CORNING	CRNGARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	BLOOMING GROVE	BLGVARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	KNOBEL	KNBLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	CARRYVILLE	CRVLARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	PIGGOTT	PGGTARXA
CENTURYTEL OF CENTRAL ARKANSAS	Clay	POLLARD	PLRDARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	SILAM SPGS	SMSPARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	MAYSVILLE	MYVLARXA

## ALLTEL Communications, Inc.

## Tier One Rural Wire Centers

COMPANY	COUNTY	WIRECENTER	CLLI CODE
CENTURYTEL OF NORTHWEST ARKANSAS	Drew	TILLAR	TLLRARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Scott	BOLES	BOLSARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Lincoln	STAR CITY	STCYARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Desha	DUMAS	DUMSARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Scott	WALDRON	WDRNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Lincoln	GOULD	GOLDARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Sebastian	MIDLAND	MDLDARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Sebastian	MANSFIELD	MNFDARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Sebastian	HACKETT	HCKTARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Sebastian	GREENWOOD	GNWDARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Logan	BOONEVILLE	BNVLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Franklin	CHARLESTON	CHTNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Franklin	RATCLIFF	RTCLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Logan	PARIS	PARSARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Crawford	ALMA	ALMAARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Logan	SUBIACO	SUBCARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Yell	CENTERVILLE	CNVLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Logan	SCRANTON	SCTNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Franklin	ALTUS	ALTSARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Yell	DARDANELLE	DRDNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Franklin	OZARK	OZRKARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Crawford	MOUNTAINBURG	MTBGARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Johnson	HARTMAN	HTMNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Pope	RUSSELLVILLE	RLVLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Pope	LONDON	LONDARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Pope	ATKINS	ATKNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Monroe	HOLLY GROVE	HLGVARXB
CENTURYTEL OF NORTHWEST ARKANSAS	Johnson	CLARKSVILLE	CLVLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Johnson	LAMAR	LAMRARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Monroe	CLARENDON	CLDNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Pope	DOVER	DOVRARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Washington	WINSLOW	WNSLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Pope	HECTOR	HCTRARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Johnson	SALUS	SALSARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	GENTRY	GNTRARXB
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	SPRINGDALE	EMSPARXA
CENTURYTEL OF NORTHWEST ARKANSAS	White	BALD KNOB	BLKNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	CENTERTON	CNTRARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	SULPHUR SPGS	SLSPARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	PEA RIDGE	PERGARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Independence	PLEASANT PLAINS	PLPLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	GARFIELD	GRFDARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Benton	GARFIELD	GTWYARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Poinsett	TRUMANN	TRMNARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Craighead	BAY	BAY ARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Craighead	CARAWAY	CRWYARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Craighead	LK CITY	LKCYARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Craighead	MONETTE	MNTTARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Mississippi	MANILA	MANLARXA
CENTURYTEL OF NORTHWEST ARKANSAS	Mississippi	LEACHVILLE	LCVLARXA